



LAND MOBILE COMMUNICATIONS COUNCIL

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MEMBER

AAA

AAR January 14, 2008

AASHTO

AFWA

APCO Fred Campbell
API Chief, Wireless Telecommunications Bureau
Federal Communications Commission

ASRI 445 12th Street, SW

CSAA Washington, D.C. 20554

EWA

FCCA

FIT

IAFC

IMSA

ITSA

MRFAC Dear Mr. Campbell:

NASF In the Second Report & Order in WT Docket 99-87 the Commission established
PCIA deadlines by which existing Part 90 licensees operating on frequencies between 150 MHz
TIA – 512 MHz must convert to technologies that either operate at 12.5 kHz occupied
UTC bandwidth or, if operating at a bandwidth greater than 12.5 kHz, must provide an
equivalent efficiency of one voice path per 12.5 kHz of bandwidth occupied. In addition
to the final narrowbanding deadline, the Commission established interim deadlines
applicable to licensing new stations and modifying existing stations.


In the Third Memorandum and Order, Third Further Notice of Proposed Rulemaking in the same proceeding the Commission stated: "No later than December 31, 2009, the Wireless Telecommunications Bureau will issue a Public Notice reminding licensees and frequency coordinators of the impending January 1, 2011 deadline for filing new applications and modifications of any systems utilizing 25 kHz channels. The Public Notice will also serve as a reminder that all Public Safety Radio Pool and Industrial/Business Radio Pool licensees are required to migrate to 12.5 kHz technology by January 1, 2013."

As you know, the Land Mobile Communications Council includes in its membership, all of the FCC-certified Frequency Advisory Committees (FACs). The FACs are collectively responsible for filing the overwhelming majority of applications that will be subject to the mandatory migration to narrowband operations. As such, LMCC has a keen interest in ensuring that the ongoing migration and the accompanying licensing process occur as smoothly as possible, and we take this opportunity to present the Bureau with a few ideas on facilitating said process.

Attached is a draft of a proposed Public Notice that not only reminds licensees of the impending deadlines, but also suggests a procedure requiring licensee action under which compliance with the narrowbanding requirement can be tracked. The suggested procedure will ensure an up-to-date database that accurately reflects the bandwidth status of all licensees, which is essential if FACs are to continue effectively managing the spectrum while the operating environment is undergoing constant change. It will also serve to assist the Commission in identifying those licensees that have not made the mandatory transition requirement, thus simplifying their disposition.

While the WTB's self-imposed deadline for issuing a narrowband Public Notice is nearly two years away, LMCC urges the Bureau to consider the issues to be addressed by the PN at its earliest opportunity. LMCC is pleased to serve as a resource to the Bureau as the migration process advances. We look forward to hearing from you regarding this matter and will be pleased to meet with Bureau officials at your convenience to discuss LMCC's proposal.

Sincerely,


Ralph A. Haller
President

Attachment

cc: Mr. Derek Poarch

PUBLIC NOTICE
RELATED TO MANDATORY NARROWBANDING DEADLINES
FOR PART 90 BANDS Between 150-512 MHz

In the Second Report & Order in Docket 99-87 the Commission established deadlines by which existing Part 90 licensees operating on frequencies between 150 MHz – 512 MHz must convert to technologies that either operate at 12.5 kHz occupied bandwidth or, if operating at a bandwidth greater than 12.5 kHz, must provide an equivalent efficiency of one voice path per 12.5 kHz of bandwidth occupied. In addition to the final narrowbanding deadline, the Commission established interim deadlines applicable to licensing new stations and modifying existing stations.

This Public Notice reiterates those deadlines and establishes a procedure requiring licensee action under which compliance with this requirement can be tracked. Following are the applicable deadlines:

January 1, 2011 – New Systems: all applications to implement new systems on frequencies between 150 MHz up to and including 512 MHz must employ technologies that either operate at 12.5 kHz (11.25 kHz occupied bandwidth) or provide one voice path per 12.5 kHz of occupied bandwidth OR provide a data rate of 4800 bps per 6.25 kHz of bandwidth occupied.

January 1, 2011 – Modifications to existing systems: all applications seeking modifications to existing systems that would increase the station's service area (37 dBu VHF/39 dBu UHF) must employ technologies that either operate at 12.5 kHz (11.25 kHz occupied bandwidth) or employ a technology that provides one voice path per 12.5 kHz of occupied bandwidth OR provides a data rate of 4800 bps per 6.25 kHz of bandwidth occupied.

January 1, 2013 – all incumbent Part 90 systems operating on frequencies between 150 MHz up to and including 512 MHz must operate at 12.5 kHz (11.25 kHz occupied bandwidth) or employ a technology that provides one voice path per 12.5 kHz of occupied bandwidth OR provides a data rate of 4800 bps per 6.25 kHz of bandwidth occupied .

Authorizations of incumbent licensees who fail to meet these deadlines will be considered to have cancelled automatically as of January 1, 2013. To ensure that all affected licensees comply with the listed narrowbanding compliance deadlines, the Commission is establishing the following procedures:

- As of (10 days after issues of public notice), new applicants who meet, or existing licensees who modify their authorizations¹ to meet the narrowbanding requirements must use new Radio Service Codes in their applications as follows:
 - Conventional Industrial Business IH
 - Conventional Commercial IL
 - Conventional Public Safety PV
 - Trunked Industrial Business YR
 - Trunked Commercial YT
 - Trunked Public Safety YV

- To help ensure a smooth migration, the rules allow licensees to operate dual mode equipment at both 25 kHz and 12.5 kHz or greater efficiencies until the January 1, 2013 deadline. As of January 1, 2013, any licensees operating dual mode equipment must ensure that the 25 kHz efficiency mode is disabled. We understand that for much of the equipment in the market, this can be done through software rather than hardware changes so such dual mode radios can continue to be used after January 1, 2013 if the 25 kHz efficiency mode is disabled.

- Licensees whose equipment is capable of operating dual mode must submit certification by February 1, 2013 that 25 kHz efficiency modes were disabled by the January 1, 2013 deadline.

Licensees who employ technologies which meet the narrowbanding deadlines but fail to modify their licenses to show the correct service code and emission designator will be considered to have cancelled automatically as of January 1, 2013. The Commission expects to issue a public notice of those tentative cancellations soon after the January 1, 2013 deadline. Reinstatement of those licenses would require a successful Petition for Reconsideration.

¹ Existing licensees already operating at 12.5 kHz would be permitted to file a notification/certification of compliance and a request to change Radio Service directly with the FCC Licensing Division in Gettysburg. No license fee or frequency coordination would be required.